

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

TECSEC, INC.,  
Plaintiff,

v.

INTERNATIONAL BUSINESS  
MACHINES CORPORATION, *et al.*,  
Defendants.

NO. 1:10-cv-00115-PTG-WEF

**CISCO SYSTEMS, INC.'S MOTION TO EXCLUDE  
EXPERT TESTIMONY BY MR. ROY WEINSTEIN AND DR. AVIEL RUBIN**

PURSUANT TO Rule 702 of the Federal Rules of Evidence and *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), Defendant Cisco Systems, Inc. respectfully moves this Court for an Order excluding the expert testimony of Plaintiff TecSec Inc.'s experts Roy Weinstein and Dr. Aviel Rubin. The grounds and reasons for granting this motion are stated with particularity in the accompanying memorandum of law. A proposed order is submitted herewith.

Dated: May 19, 2023.

**CISCO SYSTEMS, INC.**

/s/ Craig C. Reilly

Craig C. Reilly  
Virginia State Bar No. 20942  
Law Office of Craig C. Reilly  
209 Madison Street, Suite 501  
Alexandria, VA 22314  
Phone: (703) 549-5354  
Facsimile: (703) 549-5355  
E-Mail: [craig.reilly@ccreillylaw.com](mailto:craig.reilly@ccreillylaw.com)

KILPATRICK TOWNSEND & STOCKTON  
LLP

Mitchell G. Stockwell (admitted *pro hac vice*)  
Michael J. Turton (admitted *pro hac vice*)  
Russell A. Korn (admitted *pro hac vice*)  
Amanda N. Brouillette (admitted *pro hac vice*)  
Andrew N. Saul (admitted *pro hac vice*)

1100 Peachtree Street, Suite 2800  
Atlanta, Georgia 30309-4530  
Telephone: (404) 815-6500  
Facsimile: (404) 815-6555  
E-Mail: mstockwell@kilpatricktownsend.com  
E-Mail: mturton@kilpatricktownsend.com  
E-Mail: rkorn@kilpatricktownsend.com  
E-Mail : abrouillette@kilpatricktownsend.com  
E-Mail : asaul@kilpatricktownsend.com

Alton L. Absher, III (admitted *pro hac vice*)  
1001 West Fourth Street  
Winston-Salem, NC 27101-2400  
Telephone: (336) 607-7300  
Facsimile: (336) 734-2755  
E-Mail: aabsher@kilpatricktownsend.com

*Counsel for Defendant Cisco Systems, Inc.*